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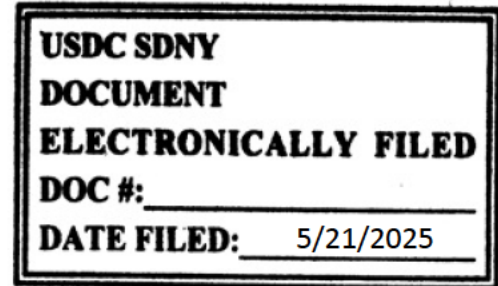
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May 20, 2025

By ECF

Hon. Stewart D. Aaron
U.S. District Court for the Southern District of New York
United States Courthouse
500 Pearl St., Room 1970
New York, New York 10007



Re: *Glen Craig v. Network Entertainment Inc. et al.*, No. 1:24-cv-10048 (ALC) (SDA)
Request to Adjourn Initial Pretrial Conference

Your Honor:

This firm represents plaintiff Glen Craig in the above-referenced matter. In accordance with Paragraph 1.C of the Court's Individual Practices, and for the reasons that follow, Craig respectfully requests that the Initial Pretrial Conference ("IPC") be adjourned to July 17, 2025, or similar date at the Court's convenience.

1. **Original date.** Per this Court's April 30, 2025, Order (ECF 39), the IPC is set for June 5, 2025, at 11:00 a.m.
2. **Previous requests.** The parties have not previously requested that the IPC be adjourned.
3. **Reasons.** All defendants have not yet appeared in the case. Fremantle Limited, an entity in the United Kingdom, waived service of process, thereby obtaining 90 days to respond to the Complaint. Their deadline to do so is June 23, 2025 (ECF 25), which is after the IPC. Holding a second Rule 26(f) conference and Rule 16(b) pretrial conference after Fremantle appears, then issuing another scheduling order solely applicable to Fremantle, would waste judicial resources and burden the parties. By contrast, holding a single IPC once all parties have appeared would benefit the parties and the Court. The parties suggest a new date of **July 17, 2025**, for the IPC, which would allow Fremantle to participate in the Rule 26(f) conference of counsel and in preparing a draft proposed case management plan.
4. **Consent.** All parties who have appeared in the case—plaintiff, defendant MGMPlus Entertainment LLC, and defendant Network Entertainment Inc.— have agreed to this request to adjourn the IPC. (Defendant The New York Times Company has been dismissed (ECF 36), and a stipulation to dismiss Apple Inc. has been filed (ECF 41).

Because a scheduling order has not yet issued, this request will not affect any other deadlines in the case.

Very respectfully,
/s/ Peter Perkowski

Peter E. Perkowski
Counsel for Plaintiff

Plaintiff's Letter Motion (ECF No. 42) is GRANTED IN PART and DENIED IN PART. The Initial Pretrial Conference currently scheduled for June 5, 2025 is hereby adjourned to July 24, 2025, at 2:00 p.m. EST (since the Court is unavailable on July 17).

SO ORDERED.

Dated: May 21, 2025